

FILED

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

OCT 18 2017

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WENDY BUCH,

Defendant.

CRIMINAL NO.

17-30163-DRH

29 U.S.C. § 501(c)

29 U.S.C. § 439(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

EMBEZZLEMENT AND THEFT FROM A LABOR UNION

1. From on or about January of 2014 and continuing through June of 2016, in St. Clair County, within the Southern District of Illinois, and elsewhere,

WENDY BUCH

defendant herein, while an employee of the Transportation Communications Union Lodge T-574, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the money, funds, properties, and other assets of said labor organization.

2. TCU Lodge T-574 is based in East St. Louis, Illinois. The union has approximately 75 members who are employed by Alton & Southern Railway, Union Pacific, and Terminal Railroad in clerical and janitorial positions. The union is governed by a uniform constitution and bylaws from Transportation Communications Union (TCU) and the

International Association Machinists (IAM). To fund the union, Members of Lodge T-574 currently pay \$88.79 per month in union dues. All members must pay a \$200 initiation fee to join the union.

3. **WENDY BUCH** was appointed financial secretary-treasurer of Lodge T-574 in approximately April of 2014. She held that position until she resigned on May 31, 2016. As financial secretary-treasurer, **WENDY BUCH** was responsible for handling payroll, writing checks and preparing financial reports, such as Form LM-3. She was the sole check signatory on the union's checking and saving account.

4. **WENDY BUCH**, misappropriated \$11,957.34 from the union's checking account from June 2014 through April 2016 by writing unauthorized checks to herself and by making unauthorized withdrawals. She then concealed her actions by making false entries on the union's Labor Organization Annual Financial Report (Form LM-3).

All in violation of Title 29, United States Code, Section 501(c).

COUNT 2

FALSIFICATION OF 2014 ANNUAL LM-3 FINANCIAL REPORT FILED BY LABOR UNION

1. At all times material to this Indictment the Transportation Communications Union Lodge T-574 was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

2. That on or about September 30, 2015, in St. Clair County, within the Southern District of Illinois, and elsewhere,

WENDY BUCH

defendant herein, did make a false statement and representation of material fact about the total salary and other disbursements that she received, knowing it to be false, in a report and document required to be filed by the Transportation Communications Union Lodge T-574, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM-3 for the union's fiscal year ending on December 31, 2014.

All in violation of Title 29, United States Code, Section 439(b).

COUNT 3

FALSIFICATION OF 2015 ANNUAL LM-3 FINANCIAL REPORT FILED BY LABOR UNION

1. At all times material to this Indictment the Transportation Communications Union Lodge T-574 was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

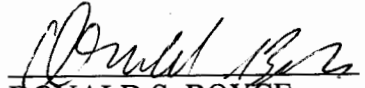
2. That on or about March 31, 2016, in St. Clair County, within the Southern District of Illinois, and elsewhere,


WENDY BUCH

defendant herein, did make a false statement and representation of material fact about the total salary and other disbursements that she received, knowing it to be false, in a report and document required to be filed by the Transportation Communications Union Lodge T-574, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM-3 for the union's fiscal year ending on December 31, 2015.

All in violation of Title 29, United States Code, Section 439(b).




DONALD S. BOYCE
United States Attorney
Southern District of Illinois


NORMAN R. SMITH
Assistant United States Attorney

Recommended bond: personal recognizance